

EXHIBIT 16

**To
PLAINTIFF NICOLE HARRIS'S MOTION TO COMPEL DISCOVERY
RESPONSES FROM THE CITY OF CHICAGO**

November 2, 2015

Case No. 1:14-cv-4391

From: Margot Klein
Sent: Tuesday, October 20, 2015 3:18 PM
To: 'flynnk@gtlaw.com' <flynnk@gtlaw.com>; FordyceT@gtlaw.com
Cc: Stuart Chanen <Stuart.Chanen@Valoremlaw.com>
Subject: Harris v. City of Chicago - contd. meet and confer

Hi Tiffany and Kyle –

Thanks again for speaking with me this morning. This memorializes our conversation.

The threshold issue as to both the First Set of Interrogatories and the Second Set of Production Requests is the appropriate time period. You maintained the City's position that only 2000-05 is relevant, and the City refuses to provide information beyond that time period. We believe 2000 to the present covers a relevant time period, although we offered to limit the scope to 2000 to the date of the City's responses. We appear to be at an impasse on this one, and as I mentioned, we will move to compel more complete responses.

Interrogatories

1. Regarding Nos. 4 and 6, you do not know if and when you will be able to supplement because you have no responsive information (yet). I understood from our call that you have undertaken an investigation but that it was limited to 2000-05 - please let me know if I am mistaken.
2. You are supplementing the City's responses to Interrogatory Nos. 5 and 7 by providing a substantive response today.
3. As to the Oct. 12 supplemental response you provided to No. 1, I stated that the answers to No. 1(D), (H), (I), (J) and (O) are so general as to be nonresponsive. Reciting only what appears in the documents is not sufficient when the interrogatory specifically calls for more. As I explained on the call, the purpose of this exercise is to discover information possessed by the City, not to have you summarize what the documents already show. Please let us know whether you will supplement these subparts.

4. As to the Oct. 12 response to Nos. 2 and 3, the answers are completely nonresponsive. Here too, these questions do not call for summaries of what appears in the documents, and simply rehashing the documents without talking to the people identified therein is not enough. Providing summaries of the document might produce long answers, but it provides none of the specific information called for by the question. Because the City did not identify who heard which person, Nicole, Sta-Von or Diante, make a statement, or provide any of the specifics called for in the interrogatories (re No. 2, which person they heard, what they heard, the date and time of the statement and the names and contact information of others present; re No. 3, who observed the demeanor of which person, Nicole, Sta-Von or Diante, the demeanor observed, the date and time the demeanor was observed and the names and contact information of others present), the answers are insufficient.

Thank you for agreeing to reconsider certain of the City's responses in light of our conversation; as we discussed, if they are not supplemented by Friday, we will move to compel on Monday. With depositions beginning in two weeks, time is critical, and we believe we have been more than patient thus far.

Production Requests

1. You do not know if and when you will be able to supplement Nos. 3 and 5 because you have no responsive information (yet). I understood from our call that you have undertaken an investigation but that it was limited to 2000-05 - please let me know if I am mistaken.
2. You are supplementing the City's response to No. 4 by providing a substantive response today. I understood from our call that the answer will be limited to 2000-05, but please let me know if I am mistaken.
3. Your Oct. 12 response to Nos. 6-8 was limited in scope to 2000-05. As with the interrogatories, we do not believe this is sufficient nor that there is a logical basis to impose this restriction.

Thanks, I look forward to hearing from you.

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To: Margot Klein <Margot.Klein@Valoremlaw.com>; Stuart Chanen <Stuart.Chanen@Valoremlaw.com>;
FordyceT@gtlaw.com
Subject: RE: Confirming our call

Thank you for working with us on this. We are available on Tuesday at 11 a.m. and we will call the same dial-in then.
Thanks!

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